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March 13, 2023

## VIA ECF

Hon. Renée Marie Bumb, U.S.D.J. Mitchell H. Cohen Courthouse, Courtroom 3D 4th & Cooper Streets Camden, New Jersey 08101

> Re: Mazahreh v. Grewal

> > Civil Action No. 1:20-cv-17598-RMB-JS

Dear Judge Bumb:

We represent Plaintiffs in the above referenced matter.

As Your Honor is aware, the parties have been negotiating a counsel fee award to be paid to Plaintiffs as prevailing parties under 42 U.S.C. 1988. The Court has been kind enough to extend our time to do so several times. Today is the current extended deadline.

I am pleased to notify the Court on behalf of all parties that the parties have reached a settlement of the fee award, but we need a little additional time to paper the deal and present the Court with a consent order.

Accordingly, we request an extension of 30 addition days to prepare and file a consent order. We do not expect it to take that long, but rather than have to come back to ask for more time in case we run into logistical difficulties, we are asking for 30 days. There are five parties that must agree to the form of order and several are municipalities which sometimes must obtain sign off from their municipal governing bodies in order to effectuate such things.

All parties have consented to this request.

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Thank you.

Respectfully submitted,

s/ Daniel L. Schmutter
DANIEL L. SCHMUTTER

DLS/ar

cc: Daniel Vannella, Esq.

Tim Sheehan, Esq. John Gillespie, Esq. Matthew Tavares, Esq. Valerie Vladyka, Esq.

SO ORDERED this 14th day of March 2023.

Honorable Renée M. Bumb Chief U.S. District Judge